

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD APRIL 1, 2022 THROUGH APRIL 30, 2022**

Debtor: LTL Management LLC

Applicant: Skadden, Arps, Slate, Meagher & Flom LLP

Case No.: 21-30589-MBK

Client: Special Counsel to LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the “Petition Date”)

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**SECTION 1  
FEE SUMMARY**

Monthly Fee Application No. 6 or  Final Fee Application

Summary of Amounts Requested for the Period from April 1, 2022 through April 30, 2022 (the “Sixth Statement Period”).

Total Fees:	\$19,394.80
Total Disbursements:	\$9,794.76 <sup>1</sup>
Total Fees Plus Disbursements:	\$29,189.56
Minus 20% Holdback of Fees:	\$3,878.96
Amount Sought at this Time:	\$25,310.60

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	\$2,013,642.32	\$152,185.75
Total Fees Allowed to Date:	\$0.00	\$0.00
Total Retainer (If Applicable):	\$0.00	\$0.00
Total Holdback (If Applicable):	\$438,307.02	\$0.00
Total Received by Applicant:	\$1,774,563.63	\$152,185.75

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<sup>1</sup> A total of \$9,733.46 in out of town travel and equipment rental incurred in February is included in these disbursements because it was inadvertently omitted from the February Monthly Fee Statement [Dkt 1915].

**COMPENSATION BY: PROFESSIONAL  
APRIL 1, 2022 THROUGH APRIL 30, 2022**

The attorneys who rendered professional services in these chapter 11 cases from April 1, 2022 through April 30, 2022 (the "Fee Period") are:

Name of Professional: <b>Partners</b>	Year Admitted	Department	Hourly Rate	Total Hours Billed	Total Fees
Brown, Allison	2004	Mass Torts	\$1,113.00 / \$556.50* <sup>2</sup>	11.50	\$12,243.00
<b>Total Partners</b>				<b>11.50</b>	<b>\$12,243.00</b>

Name of Professional: <b>Counsels</b>	Year Admitted	Department	Hourly Rate	Total Hours Billed	Total Fees
McNulty, Patricia	1986	Mass Torts	\$857.00	0.40	\$342.80
<b>Total Counsels</b>				<b>0.40</b>	<b>\$342.80</b>

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<sup>2</sup> \*50% rate charged for travel time

Name of Professional: Associates	Year Admitted	Department	Hourly Rate	Total Hours Billed	Total Fees
Schoch, Joshua	2020	Mass Torts	\$522.00	10.50	\$5,481.00
<b>Total Associates</b>				<b>10.50</b>	<b>\$5,481.00</b>

The Legal Assistants who rendered professional services in these chapter 11 cases during the Fee Period are:

Name of Professional: Legal Assistants and Client Specialist	Department	Hourly Rate	Total Hours Billed	Total Fees
Efroymson, Sarah	Legal Tech	\$428.00	2.20	\$941.60
Cohen, Morgan	Mass Torts	\$322.00	0.30	\$96.60
Martin, Stephanie	Mass Torts	\$322.00	0.90	\$289.80
<b>Total Legal Assistants</b>		<b>3.40</b>		<b>\$1,328.00</b>

The total fees for the Fee Period are:

Professionals	Blended Rate	Total Hours Billed	Total Fees
Partners:	\$1,064.61	11.50	\$12,243.00
Counsels:	\$857.00	0.40	\$342.80
Associates:	\$522.00	10.50	\$5,481.00
Legal Assistants:	\$390.59	3.40	\$1,328.00
<b>Blended Attorney Rate:</b>	<b>\$806.55</b>		
<b>Blended Rate for All Timekeepers:</b>	<b>\$751.74</b>		
<b>Total Fees Incurred:</b>		<b>25.80</b>	<b>\$19,394.80</b>

**SECTION II  
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR SERVICES RENDERED BY  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
FOR THE PERIOD APRIL 1, 2022 THROUGH APRIL 30, 2022**

<b>DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
Fee/Employment Applications	11.00	\$5,642.00
Litigation Consulting	13.80	\$13,196.30
Travel Time	1.00	\$556.50
<b>Total Fees Requested</b>	<b>25.80</b>	<b>\$19,394.80</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
FOR THE PERIOD APRIL 1, 2022 THROUGH APRIL 30, 2022**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
Local Travel	\$839.56
Out-of-town Travel	
Other (Equipment rental offsite trial support)	\$5,575.80
Online Research	\$61.30
Trial Transcripts	\$3,318.10
<b>DISBURSEMENTS TOTALS</b>	<b>\$9,794.76</b>

## SECTION IV CASE HISTORY

(1) Date cases filed: October 14, 2001  
(2) Chapter under which case commenced: Chapter 11  
(3) Date of retention: March 16, 2022 *nunc pro tunc* to October 14, 2021 [Dkt. 1736] (the “Retention Order”)<sup>3</sup>.  
(4) Summarize in brief the benefits to the estate and attach supplements as needed SEE BELOW

During the Sixth Statement Period, Skadden, Arps, Slate, Meacher & Flom LLP (“Skadden”) provided the following services to the Debtor including, but not limited to, the following:

### *Fee / Employment Applications*

- Review order appointing fee examiner and memo from fee examiner in order to submit materials in compliance with same, including expenses, Monthly Fee Statements, and LEDES files.
- Review and revise invoices for privilege and compliance with U.S. Trustee’s Guidelines.
- Draft, revise, finalize and submit March Monthly Fee Statements.

### *Litigation Consulting*

- Coordinate database management with client and vendors.
- Discuss strategy for bankruptcy proceedings with client and co-counsel concerning a variety of issues.
- Prepare for and participate in omnibus hearing.
- Address issues and other matters relating to talc-related litigation.

### *Travel Time*

- Travel to and from omnibus hearing.

(5) Anticipated distribution to creditors:

(a) Administration expense:	Unknown at this time.
(b) Secured creditors:	Unknown at this time.
(c) Priority creditors:	Unknown at this time.
(d) General unsecured creditors:	Unknown at this time.

<sup>3</sup> The Retention Order is attached hereto as Exhibit A.

(6) Final disposition of case and percentage  
of dividend paid to creditors

Final dividend percentages are unknown  
at this time.

I certify under penalty of perjury that the above is true.

Date: May 27, 2022

/s/ Allison M. Brown  
Allison M. Brown